



Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at <http://about.jstor.org/participate-jstor/individuals/early-journal-content>.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact support@jstor.org.

pools, or drive away cattle which it sees drinking the oil. To be consistent our court would have to repudiate this ruling should such case come before them, for surely no greater measure of protection could with propriety be extended to an animal than is allowed to a child of tender years.

Right of Action for Slander for Vile Epithets.—The rule as supported both by reason and the weight of authority is that applying the vile epithet "son of a bitch" to a man, unaccompanied by words charging crime or involving moral turpitude, are not actionable at common law unless special damage is proven, which would generally be difficult to prove, because, as was said in one case, such epithets are of that unreasonable, inaccurate and unmeaning character which are usually found in a verbal assault made with the purpose of insulting the person addressed, and without the purpose of making any specific charge, and of evincing the contempt and exasperation of the person speaking. *Carrick v. Joachim* (La.), 52 So. 173, 28 L. R. A., N. S., 85, and cases cited in note. But under our statute of insulting words, an action would certainly lie, because such an expression is "construed as an insult and tends to violence and breach of the peace."

Postdated Checks.—A postdated check (i. e., a check dated at a time in future) is not subject to payment or acceptance until the time of its date arrives. If it be presented at a time in advance of its date, the drawee, even if he has funds on hand sufficient to pay it, cannot pay it, or retain the fund to pay, as against other checks or drafts presented and payable prior to the time the check bears date. The drawer of a postdated check does not undertake to have the funds in the drawee's hands to meet it before the time at which the check bears date arrives. *Smith v. Maddox-Rucker Banking Co.* Court of Appeals of Ga., Sept. 28, 1910, 68 S. E. 1092, citing *Joyce* *Defenses to Commercial Paper*, § 490.

Right to Affirmative Relief on Petition for Interpleader.—*McKinney v. Daniels*, 68 S. E. 1095. Supreme Court of Georgia. Sept. 24, 1910. Syllabus by the Court. A party indebted upon a note representing the balance of the unpaid purchase money for certain lands in this state, to which he held bond for title, can maintain an equitable petition in the nature of a bill of interpleader against two foreign administrators with the will annexed of the deceased payee, where each of the two administrators claims that he is the rightfully appointed administrator with the will annexed, and entitled to collect the money due on the notes, and the petitioner cannot, without reasonable apprehension of danger, determine which of the two claimants of the fund is rightfully entitled thereto, upon offering to pay the fund in controversy into the registry of the court, that it may be awarded to